

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

**JACK STEPHEN PURSLEY,
AKA STEVE PURSLEY**

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NO. 4:18-CR-575 (HUGHES)

United States' Notice of Proposal for Digital Presentation at Trial

During the parties' November 19, 2018 pretrial conference with the Court, the United States requested that the Court permit the parties to present their evidence in this trial digitally. Based on the Court's go ahead (Doc. 53, Tr. 81:1 - 82:15), the United States has put together its plan for an electronic trial presentation. A schematic of the government's proposal is attached to this notice, and counsel for the United States will be prepared to discuss the plan at the parties' June 10, 2019 hearing.

As the Court is aware, the parties took the videotaped deposition of Kerry Smith in the Isle of Man, and both parties would like to play portions of that deposition for the jury. Doc. 92. The United States has also moved the Court for permission to play excerpts from Pursley's deposition in its case-in-chief. Doc. 93. Moreover, an electronic trial will permit a far more efficient presentation of the parties' evidence, help keep the juror's engaged throughout trial, and ultimately reduce the total length of trial.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will serve a copy of this document on all counsel of record.



Sean Beaty
Trial Attorney, Tax Division

